UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

GARDA CL SOUTHWEST Employer,

Case No. 14-RC-209886

V.

INTERNATIONAL UNION, SECURITY, POLICE AND FIRE PROFESSIONALS OF AMERICA (SPFPA),
Petitioner

Petitioner's Motion Opposing Employer's Request for Review

Petitioner files this Motion Opposing Employer's Request for Review. For the reasons stated in the brief supporting this motion, without limitation, Employer has failed to show that any of the four (4) grounds for review of the Regional Director's decision enumerated in Rule No. 102.67(c)-(d) are present in this case.

Accordingly, Petitioner Requests that the Board deny Employer's Request and affirm the Regional Director's decision and order that a rerun election be conducted without delay.

Respectfully Submitted,

GREGORY, MOORE, JEAKLE & BROOKS, P.C.

/s/Richard M. Olszewski By: Richard M. Olszewski 65 Cadillac Square, Suite 3727 Detroit, MI 48226 (313) 964-5600

Dated: May 11, 2018

CERTIFICATE OF SERVICE

I certify that on May 11, 2018 a true and correct copy of the foregoing was efiled with the NLRB in Washington, D.C., Region 14, and served by email upon the following:

Jeffrey W. Pagano, Attorney Twomey Latham jpagano@suffolklaw.com 33 West Second Street P.O. Box 9398 Riverhead, NY 11901-9398 Ivelices Linares, ER Dir. Garda World Cash Services ivelices.linares@garda.com 1022 South 9th Street Saint-Louis, MO 63104-3596 Leonard Perez Region 14, Regional Director leonard.perez@nlrb.gov 1222 Spruce Street Room 8.302 St. Louis, MO 63103-2829 Phillip Wells Region 14, Agent Philip.wells@nlrb.gov 1222 Spruce Street Room 8.302 St. Louis, MO 63103-2829

<u>/s/Richard M. Olszewski</u> By: Richard M. Olszewski